

EXHIBIT B

Milbank

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July 1, 2021

VIA EMAIL

Christopher Oprison, Esq.
DLA Piper LLP
200 South Biscayne Boulevard
Suite 2500
Miami, FL 33131-5341

Re: *Shanghai Fosun Pharmaceutical Group Co., Ltd. v. Dr. John Hajjar, M.D.,
Sovereign Medical Services, Inc., and Sovereign Capital Holdings, LLC*, Case No.
01-19-0000-6514

Dear Chris:

I write on behalf of my client, Barton Schack, regarding the subpoena for testimony and documents issued to Mr. Schack, dated June 15, 2021, in connection with an arbitration before the Honorable Garrett Brown in the above-captioned matter (the “Subpoena”), and in follow-up to our teleconference on June 29, 2021. At this time, Mr. Schack—who is not a party to the arbitration—intends to move to quash the Subpoena on grounds of relevance, burden, and infringement on his constitutional rights. In addition, to the extent that Mr. Schack is required to appear at the July 13, 2021 hearing for testimony and/or to produce documents, Mr. Schack intends to invoke his Fifth Amendment right against self-incrimination.

Please contact me with any questions at (212) 530-5626.

Sincerely,

/s/ Brenton T. Culpepper

Brenton T. Culpepper

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